

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MILLENNIUM FUNDING, INC., et al,

Plaintiffs,

v.

WICKED TECHNOLOGY LIMITED et al.,

Defendants.

Civil Action No. 1:21-cv-00282-RDA-TCB

JOINT NOTICE OF SETTLEMENT PROGRESS

Plaintiffs MILLENNIUM FUNDING, INC., EVE NEVADA, LLC, HUNTER KILLER PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., GUNFIGHTER PRODUCTIONS, LLC, MILLENNIUM IP, INC., VOLTAGE HOLDINGS, LLC, HB PRODUCTIONS, INC., KILLING LINK DISTRIBUTION, LLC, LHF PRODUCTIONS, INC., RAMBO V PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., WONDER ONE, LLC and 42 VENTURES, LLC (collectively, “Plaintiffs”) and Defendants WICKED TECHNOLOGY LIMITED, VPN.HT Limited, MOHAMED AMINE FAOUANI (“Wicked Defendants”) (collectively, “Parties”), submit this notice to update the court on the progress of their settlement discussions.

The Parties first notified the court of a prospective settlement on August 30, 2021 (Dkt. No.046). On August 31, 2021, the court stayed (Dkt. No. 047) its determination of the Wicked Defendant’s motion to dismiss (Dkt. No. 29) until October 1, 2021.

The Parties now report that they have executed an agreement to resolve the claims between them and are waiting for certain conditions precedent to be met, after which the Parties intend to file a joint order with the Court.

In view of the foregoing, the Parties respectfully request the Court to extend the stay (Dkt. No. 047) through Nov. 1, 2021.

Dated September 29, 2021

Respectfully submitted,

/s/ Kerry S. Culpepper

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Amine Faouani*

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2021, a true copy of the foregoing Memorandum in Support of Motion to Dismiss Plaintiffs' First Amended Complaint was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

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